

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

v.)

BASHIR YASIN MOHAMUD (19))

No. 3:10-00260-19

Judge Haynes

DEFENDANT BASHIR YASIN MOHAMUD'S RENEWED MOTION TO DISMISS

Comes now the Defendant, Bashir Yasin Mohamud, by and through his undersigned counsel, Bob Lynch, Jr., and hereby moves to renew his Motion to Dismiss which he filed on June 21, 2011. (See D.E. #741.) On that same date, he filed a Memorandum in Support of Said Motion. (See D.E. #742.) On that same date, the Defendant Bashir Mohamud filed under seal, Exhibits A – F. (See D.E. #741.) The Defendant Bashir Mohamud adopts those pleadings in support of this renewed Motion to Dismiss.

Essentially the Defendant argued that based on the discovery provided by the Government, there was no evidence that the Defendant was involved in any conspiracy to traffic minors or anyone for commercial sex acts, nor did any statements of Jane Doe #4 support any alleged federal crimes, or any crimes. In that same motion to dismiss, the Defendant sought in the alternative an order from the Court requiring the Government to respond to his bill of particulars. The Government responded to these pleadings on July 5, 2011, (see D.E. #764) and essentially relied on the four corners of the Indictment to refute the Defendant's motion to dismiss.

Thereafter, the following took place:

1. On November 3, 2011, this Honorable Court denied Defendant Mohamud's Motions to